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September 21, 2012

ELECTRONICALLY FILED

Hon. Michael A. Shipp, U.S.D.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Federal Building &
Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: ***In re New Jersey Tax Sales Certificates Antitrust Litig.***
Master Docket No. 3:12-CV-01893-MAS-TJB

Dear Judge Shipp:

Together with our co-counsel, this office represents the plaintiff in *MSC, LLC v. Collins*, Civil Action No. 12-cv-2395, one of the consolidated cases in this matter. I am also the Proposed Liaison Counsel for plaintiffs in the pending motion for appointment of Hagens Berman Sobol Shapiro, LLP and Hausfeld LLP ("Class Counsel Movants") as interim class counsel ("Class Counsel Motion") [Docket Entry No. 52]. The Class Counsel Motion is one of two pending motions for appointment of interim class counsel. Both motions are described in the parties' September 19, 2012 Joint Status Report. [Docket Entry No. 84, at p. 2].

The Class Counsel Motion was filed in mid-June 2012. Since that time, there have been developments that further demonstrate that the Class Counsel Motion should be granted.

For example, notwithstanding the pendency of a motion to stay foreclosure proceedings filed by Class Counsel Movants and their co-counsel before the removal to federal court, the defendants in this litigation continue to seek to initiate and litigate foreclosure proceedings in New Jersey state court against distressed homeowners based on tax sale certificates that the defendants in this case acquired pursuant to the conspiracy alleged in this litigation. *See, e.g., Sass Muni V, LLC v. Zippi*, Superior Court of New Jersey, Cape May County, Docket No. F-58121-10 (foreclosure complaint based on allegedly illegally acquired and/or invalid tax sale certificate) (copy attached as Exhibit A). Class Counsel Movants and their co-counsel have fought these efforts and in some cases, convinced the state court to enjoin the defendants from foreclosing on property until this class action litigation is resolved. *See, e.g., May 3, 2012 Order of Hon. Yolanda Ciccone, A.J.S.C., in Crusader Servicing Corp. v. Boyer*, F-40780-08 Superior Court of New Jersey, Hunterdon County, Docket No. F-40780-08 (copy attached as Exhibit B).



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By this letter, Class Counsel Movants request leave to file a short supplement to their previous submission to explain how these and other developments are relevant to show which proposed interim class counsel group is "best able to represent the interests of the class" in this litigation. Alternatively, if the Court prefers, Class Counsel Movants will make this request at the upcoming status conference. Either way, if the Court permits supplementation, and should the competing movants [Docket Entry No. 50] wish to supplement their papers as well, Class Counsel Movants would have no objection to that.

Thank you very much for your consideration.

Respectfully,

/s/ Bruce D. Greenberg

Bruce D. Greenberg

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cc: All counsel via *ECF*